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Counsel for Defendant NUNEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARC NUNEZ,

Defendant.

Case No. CR 21-13 CRB (LB)

**MOTION AND [PROPOSED]
ORDER FOR TRAVEL**

Marc Nunez is released on bond with a condition that he may not leave the Northern District of California. Mr. Nunez pleaded guilty on July 15, 2022 to possession of child pornography. He has been awaiting sentencing and had a sentencing hearing on March 1, 2023. Judge Breyer continued the sentencing until April 19, 2023 because of concerns regarding allegations in the Presentence Report that he wanted to give the government additional time to look into.

Mr. Nunez respectfully requests to travel to San Dimas, California for a 10-day supervisor work training beginning on Monday, March 6 to March 16, 2023. The work training is necessary for Mr. Nunez to obtain his promotion to supervisor at Total Wine and More, a job he's held since August 2021. Defense counsel raised this travel request with pretrial officer Tim Elder on February 24, 2023 and Mr. Elder wanted to wait on deciding the matter until after Mr. Nunez's sentencing.

1 The government and pretrial services do not object to the travel request. Pretrial does not object
2 given that Mr. Nunez has provided a travel itinerary with lodging information and work confirmation for
3 the training. Additionally, Mr. Nunez's custodian has agreed to accompany him for the duration of the
4 training. However, pretrial indicates it does not support the travel given that Mr. Nunez is post
5 conviction, pending sentencing, and with consideration of the allegations in the PSR report causing the
6 delay in sentencing.

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10 March 3, 2023
Dated

JODI LINKER
Federal Public Defender
Northern District of California

11
12 /S

13 ELISSE LAROCHE
Assistant Federal Public Defender

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15 IT IS SO ORDERED.

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17 _____
Dated

18 _____
LAUREL BEELER
United States Magistrate Judge